

Comments To ET Docket No. 03-137 of Neviana Nikoloski

Document

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Proposed Changes in the Commission's Rules)
Regarding Human Exposure to) ET Docket No. 03-137
Radiofrequency Electromagnetic Fields)

NOTICE OF PROPOSED RULE MAKING
Adopted: June 12, 2003 **Released:** June 26, 2003

Comment

In the function as head of the near-field laboratories at the IT'IS Foundation, I have conducted or supervised many compliance tests in accordance to the various standards including Supplement C. We have also analyzed various reports submitted to FCC by other laboratories.

I have noticed that FCC has no procedure to ensure the appropriate functioning of the measurement systems applied, i.e., FCC only relays on the uncertainty claims made by the laboratories. In view of the complexity of the SAR evaluations and to avoid degeneration of the system performance over time or due to modifications, the IEEE 1528 and IEC 106 – Part 1 standards and guidelines require a set of procedures to validate the system at least every year and whenever a modification of the system parameters has

been made. Otherwise, it cannot be excluded that the submitted SAR values substantially deviate by a factor of two and more. In order to insure compliance and to avoid distortion of market competition, I would like to make the proposal that FCC also defines similar system validation procedures (system validation should not be mistaken with system performance check). This would be beneficial for the consumers as well as for the industry.

References

- [1] IEEE 1528, "Recommended Practice for Determining the Peak Spatial-Average Specific Absorption Rate (SAR) in the Human Head from Wireless Communications Devices: Measurement Techniques," Final Draft, November 2003
- [2] IEC, 106/61/CDV // prEN 62209-1:2003, "Procedure to measure the Specific Absorption Rate (SAR) in the frequency range of 300 MHz to 3 GHz. Part 1: hand-held mobile wireless communication devices", 2003

For the IT'IS Foundation

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